

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

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SECURITIES AND EXCHANGE :
COMMISSION, :
Plaintiff, :
-against- : Civil Action No. 1:21-cv-00260-PB
LBRY, INC., :
Defendant. :
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**ASSENTED-TO MOTION TO ENLARGE DEADLINE TO OBJECT TO PLAINTIFF'S
MOTION FOR JUDGMENT ON THE PLEADINGS ON DEFENDANT'S
AFFIRMATIVE DEFENSE OF SELECTIVE ENFORCEMENT**

NOW COMES the Defendant, LBRY, Inc. ("LBRY"), by and through counsel, Shaheen & Gordon, P.A. and Perkins Coie LLP, moving to enlarge the deadline to object to Plaintiff Securities and Exchange Commission's ("SEC") Motion for Judgment on the Pleadings on Defendant's Affirmative Defense of Selective Enforcement and, in support thereof, states as follows:

1. On July 12, 2021, the SEC filed its Motion for Judgment on the Pleadings, which asks the Court to grant judgment in the SEC's favor on LBRY's affirmative defense of selective enforcement.
2. The current deadline for LBRY to object to the Motion for Judgment on the Pleadings is July 26, 2021. LBRY requests an enlargement of time to file an Objection to the Motion for Judgment on the Pleadings to August 9, 2021.
3. Granting LBRY two additional weeks to respond will allow LBRY sufficient time to fully address the issues raised in the SEC's motion regarding LBRY's selective-enforcement defense.

4. LBRY certifies pursuant to Local Rule 7.2 that the relief requested will not result in the continuance of any hearing, conference, or trial in this matter.

5. The SEC assents to the relief sought herein.

6. Due to the nature of the relief sought, no memorandum of law is required.

WHEREFORE, LBRY respectfully requests that this Honorable Court:

- a. Grant the within Motion;
- b. Enlarge the deadline to file an Objection to the SEC's Motion for Judgment on the Pleadings to August 9, 2021; and
- c. Grant such further relief as the Court deems necessary, just and fair.

Dated: July 15, 2021

Respectfully submitted,

LBRY, INC.

By its Attorneys,

/s/ William E. Christie

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

DATED: July 15, 2021

/s/ *William E. Christie*

William E. Christie
NH Bar No. 11255